



April 15, 2011

Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Sent via E-mail: deltaplancomment@deltacouncil.ca.gov

Dear Chairman Isenberg and Members of the Council:

Re: Comments on Second Staff Draft of the Delta Plan (dated March 18, 2011)

Thank you for the opportunity to comment on the Second Staff Draft of the Delta Plan, dated March 18, 2011. Our comments are primarily focused on the geographic scope and use of the Delta Plan. Most importantly, to the extent that the watersheds of the Sierra Nevada are identified as part of the Delta Plan's scope (p. 4, line 28-29) and are specifically called out within its *Second Planning Area* (the so-called "Delta Watershed Area" coupled with the "areas outside of the Delta in which exported water is used," p. 4, lines 33-37), it is critical that the Plan:

1. **Recognize the value, needs and authorities of the upper watershed areas** included in the Second Planning Area.
2. **"Do no harm" to the upper watershed interests and communities**, i.e. consult with affected agencies and entities to identify and address potential current and future impacts to the upper watersheds when developing policies, regulatory actions, implementation measures and performance targets.

❖ *As an example, the draft Plan calls for establishing public trust flow standards for the "Delta watershed" that are protective of beneficial uses and contribute to achievement of the ecosystem restoration objectives for the Delta (ER P5, p. 34, lines 29-36). Such an action, if focused solely on downstream benefits to the Delta, could negatively affect the ability of organizations and agencies in the upper watersheds to exercise their area of origin water rights and meet beneficial use and ecosystem restoration goals necessary to serve Sierra residents, businesses and visitors and protect the source of much of the State's water supply.*

3. **Direct a portion of the Plan's investment to the watersheds in the Second Planning Area** to help meet the Delta Plan's coequal goals and objectives related to assuring a reliable water supply and protecting, enhancing and managing water and environmental resources.

❖ *As an example, investments in upstream forest health can reduce the risk of large, damaging fires that may result in additional siltation downstream; meadow and riparian area restoration in the headwaters can increase water storage capacity and help to regulate the release of water through the system over time; and water quality improvement projects upstream can reduce the need for costly treatment for downstream users.*

4. **Partner with the Sierra Nevada Conservancy (SNC) as a State agency liaison** to coordinate and convene local and regional entities in the Second Planning Area and help develop and implement specific recommendations applicable to that area.

❖ *As an example regarding implementation support, the draft Plan recommends actions by the Wildlife Conservation Board and the Delta Conservancy to develop a plan for acquiring land necessary to achieve ecosystem restoration goals (ER R4 and R5, p. 35, lines 23-37). The Sierra Nevada Conservancy should be added to do the same for lands in the Second Planning Area.*

We also concur with the comments of other agencies and entities related to the need for the Plan to more clearly delineate its scope and statutory authorities and to better define the differences between activities contemplated in the different planning and/or study areas. This is especially important in terms of what policies and regulatory actions will apply to each. And finally, we recommend that the next draft of the Plan include a comprehensive glossary of terms and acronyms.

As the state's primary watershed, the Sierra Nevada Region provides 23 million Californians with all or part of their domestic water supply, helps meet the needs of agriculture and other businesses in the state and contributes significantly to addressing environmental needs, including those in the Sacramento-San Joaquin Delta. Given these facts, according to "Looking to the Source: Watersheds of the Sierra Nevada," a report recently published by the well-respected Water Education Foundation, the Sierra Nevada is as important as the Delta in addressing California's water needs. Additionally, the report points out that half or more of the Delta's inflow comes from water originating in the Sierra. As a result, the two systems are clearly linked and mutually necessary for the future health and well-being of the state.

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If you or your staff has any questions regarding the SNC's comments, please contact me at (530) 823-4667 or Kerri Timmer, Program Manager, at (530) 823-4683.

Sincerely,



JIM BRANHAM
Executive Officer

Attachments: SNC boundary map

cc: Kerri Timmer, SNC Program Manager

SIERRA NEVADA CONSERVANCY



Mission Statement

The Sierra Nevada Conservancy initiates, encourages, and supports efforts that improve the environmental, economic and social well-being of the Sierra Nevada Region, its communities and the citizens of California.

Vision Statement

The Sierra Nevada Conservancy's vision for the future is: The magnificent Sierra Nevada Region enjoys outstanding environmental, economic and social health with vibrant communities and landscapes sustained for future generations.

